

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF  
TENNESSEE AT GREENEVILLE, TENNESSEE

In re: Christine Lynn Rhymer  
Debtor.

Chapter 7 Bankruptcy  
Case No. 2-22-bk-51188-RRM

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Christine Lynn Rhymer  
Plaintiff,

v.

Adv. Proc. No.: 2:23-ap-- RRM

United States of America  
and  
Navient Solutions, Inc.  
Defendants.

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ADVERSARY PROCEEDING SEEKING DISCHARGE OF STUDENT LOAN(S)

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Plaintiff, through counsel, brings this adversary proceeding to determine whether Debtor Christine Lynn Rhymer may modify or discharge some or all of her student loan(s) owed to Defendant pursuant to 11 U.S.C. §523(a)(8). For cause Debtor alleges:

1. The Plaintiff is a Chapter 7 Debtor in the above case filed December 8, 2022.
2. Defendant United States of America administers student loan programs through the U. S. Department of Education. Service may be made upon the United States by serving the U.S. Dept of Education, Office of General Counsel, U.S. Department of Education, 400 Maryland Avenue, SW Washington, D.C. 20202, and the Civil Process Clerk United States Attorney's Office, Howard H. Baker Jr. U.S. Courthouse, 800 Market Street, Suite 211, Knoxville, Tennessee 37902, and by serving the Attorney General of the United States at 950 Pennsylvania Avenue NW, Washington, DC 20530-0001

3. Defendant Navient Solutions, Inc. may be served by serving Jack Remondi, President and CEO Navient Solutions, Inc, 123 S. Justison Street, Suite 300 Wilmington, DE 19801-5363 and it's Registered Agent for Service of Process Corporation Service Company, 2908 Poston Ave., Nashville, TN 37203-1312.
4. This court has jurisdiction over the subject matter of this proceeding pursuant to 28 U.S.C. §1334 and venue is proper pursuant to 28 U.S.C. §1409. This is a core proceeding arising in or related to this Chapter 7 case.
5. This is a proceeding to determine if Debtor may modify or discharge some or all of her student loan(s) owed to Defendant through the U. S. Department of Education pursuant to 11 U.S.C. §523(a)(8).
6. Plaintiff is indebted for student loan(s) totaling at least \$72,237.00. To the best of her knowledge she has one loan, number 91365035841E00220200925200925, that is serviced by Defendant Navient Solutions, Inc.
7. Plaintiff alleges that she will suffer an undue hardship if she cannot modify or discharge all or most of the student loan debt.
8. Plaintiff alleges that she has a chronic injury that will impact her future income potential.
9. Plaintiff alleges that her loan(s) have been in payment status other than in-school years for at least 10 years.

WHEREUPON PREMISES CONSIDERED, Plaintiff requests the Court to enter an Order that either modifies or discharges all or most of her student loan debt.

Respectfully submitted,

/s/ Christine Lynn Rhymer, Plaintiff

/s/Dean Greer  
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